Fruitland Magnesium Fire Site
Summary Plan for the Cleanup of Hazardous Substances
September 28, 2016

This plan summarizes steps that the United States Environmental Protection Agency Region 9 ('EPA') is planning, to address hazardous substances on the industrial property located at 3570 Fruitland Avenue, Maywood, California. On June 14, 2016 a fire on the industrial property destroyed the Panda Trade International ("PIT)" facility (a scrap metal yard) and SOKOR Metals, a precious metals recovery facility operating on a portion of the PIT facility.

1. **Closeout of the Emergency Response Phase of the Incident:** The distribution of the resident information packages will delineate the end of the emergency response-phase activities and the effective demobilization of the Unified Command.

2. **Site Cleanup Strategy**

   EPA is currently pursuing an enforcement strategy through Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA" or more commonly "Superfund"). EPA has recorded a lien on the property at 3570 Fruitland Avenue, Maywood, CA ("the Site"). EPA has sent Section 104(e) information requests to the property owner/operator(s) to determine their ability to pay cleanup costs. Concurrently, in the event that EPA determines that property owner/operator(s) do not have the financial resources or capability to complete the cleanup of hazardous substances at the Site, EPA is preparing to fund a cleanup of hazardous substances at the Site using CERCLA removal authority. In addition, EPA has approached California agencies (Cal/EPA, CalRecycle and others) to assist in the cleanup. CalRecycle has the authority to address solid wastes at co-disposal sites. Discussions regarding state-level contribution to solid waste transportation and disposal are ongoing with state agencies.

3. **Community and Inter-Governmental Engagement**

   EPA will coordinate public messaging, messaging to elected officials and community involvement ("CI") during the CERCLA removal action. As a first step in this coordination, EPA will prepare a community involvement strategy that will include a component of regular communication with LA County Department of Public Health ("DPH") staff. Similarly, EPA will coordinate outreach to local and state government officials and the press. A "next steps" fact sheet describing the removal action planning will be prepared for community-wide distribution, immediately following the distribution of resident information packages.

4. **CERCLA Removal Action at the Site**

   Cleanup of hazardous substances at the Site, either EPA-lead or with EPA oversight, should begin in October 2016 and take approximately 8 weeks to complete. The EPA federal On-Scene Coordinator ("FOSC") will be the lead EPA official for this removal action. If the removal is Fund-lead, other state or local agencies with a role (for example, CalRecycle, Cal/EPA, DTSC, Los Angeles County Department of Public Health, Los Angeles County FD Health Hazardous Materials Division) are expected to coordinate their activities with the EPA team (FOSC, public information specialist, community involvement coordinator, attorney)

   Initial Actions: Initial actions at the Site will be to stabilize the existing roof structure above the loading dock area and to construct a debris barrier along the property border with the residential properties to the south. (The structural engineering evaluation performed during the emergency

response phase determined that the roof structure was unsafe and a demolition plan was commissioned. Subsequently, the structural engineer revised the initial determination and has recommended that shoring of the structure at one corner will create safe working conditions.) This is preferable to demolition from a cost/time savings perspective and also because the roof demolition would need likely need to be to be performed prior to the removal of debris and contaminated ash/soil, which could result in unacceptable particulate dust generation. The construction of a debris barrier along the southern property border is intended to mitigate potential debris/particulate migration onto the residential properties and to minimize disruption to the residents from visual/noise impacts of removal operations. Further, there will be strict dust control measures and an air monitoring/sampling program, with an emphasis on real-time dust monitoring, to ensure that removal activities do not create health risks for residents in the surrounding area.

Phase I: The first phase of removal activities will consist of solid waste/building debris removal. If Fund-lead this will be done in collaboration with CalRecycle. All debris classified as hazardous will bed containerized, transported and disposed as hazardous waste. As areas of the property are cleared of waste, additional assessment of the surface/subsurface soils will be conducted to more fully characterize the extent of soil contamination.

Phase II: The second phase of activities will be to remove contaminated ash/soils. Cleanup goals for the site will be based on the removal screening levels ("RSLs") for Industrial Soils (developed in consultation with an EPA Region 9 Toxicologist) or 3 feet below ground surface ("bgs") maximum excavation depth. Confirmation sampling will be conducted to document achievement of the cleanup goals and/or any contamination that remains at the 3 foot bgs maximum excavation depth.

5. Site Close Out

The cleanup of hazardous substances will complete the CERCLA removal action at the industrial property. The local community would be informed that the hazardous substance cleanup is complete. Other cleanup activities, if required, should be pursued through local or state enforcement programs. For example, concerns about groundwater contamination should be addressed to Cal/EPA through the Los Angeles Regional Water Quality Control Board. Concerns about nuisance odors should be directed to the South Coast Air Quality Management District. Discussions about potential application of other state authorities for long-term cleanup can be directed to the California Department of Toxic Substances Control ("DTSC".